

Pennsylvania Department of Environmental Protection
Southeast Regional Office
Waste Management / Environmental Cleanup Program

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Date: 8/22/00

Time: _____

Number of pages including cover sheet: 27

To:

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CC: _____

From:

MATHEW ABRESERY
PA DEP

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REMARKS:

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COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES

PERMIT
FOR HAZARDOUS WASTE STORAGE AND TREATMENT

Permittee: Sun Refinery & Marketing Co.

Permit Number: PAD 980550594

Facility: Marcus Hook Facility

This permit is issued by the Commonwealth of Pennsylvania Department of Environmental Resources (DER) under authority of the Pennsylvania Solid Waste Management Act, the Act of July 7, 1980, Act 97, 35 P.S. Section 6018.101 et seq. (the Act) and DER hazardous waste regulations to Sun Refinery & Marketing Co. (hereafter called the Permittee), to operate a hazardous waste management facility located in Marcus Hook Borough, Delaware County, Delaware Avenue and Green Street, at latitude 39°48'050" North and longitude 075°25'025" West.

The Permittee must comply with all terms and conditions of this permit. This permit consists of the conditions contained herein (Parts I - IV, consisting of pages 1 through 22 and Attachments 1 through 9) and the applicable regulations contained in 25 Pa. Code Chapter 75 as specified in the permit.

This permit is based on the assumption that the information submitted in the permit application, attached to the Permittee's letter dated September 1, 1983, as modified by subsequent amendments dated November 30, 1984, December 11, 1986, March 17, 1989 and March 20, 1989 (hereafter referred to as the application), is accurate and that the facility will be constructed and/or operated as specified in the application. Any inaccuracies found in this information may be grounds for the revocation or modification of this permit (see 25 Pa. Code §§75.278, 75.279, and 75.280) and potential enforcement action. The Permittee must inform DER of any deviation from or changes in the information in the application which would affect the Permittee's ability to comply with the applicable regulations or permit conditions.

This permit is conditioned upon full compliance with all applicable provisions of the Act; DER regulations contained in 25 Pa. Code Chapter 75; the Clean Streams Law, 35 P.S. §691.1 et seq.; the Air Pollution Control Act, 35 P.S. §4001 et seq.; the Dam Safety and Encroachments Act, 32 P.S. §693.1 et seq.; the Surface Mining Conservation and Reclamation Act, 52 P.S. §1396.1 et seq.; the Coal Refuse Disposal Control Act, 52 P.S. §30.51 et seq.; all other Pennsylvania statutes related to the protection of the environment; and all Pennsylvania statutes related to the protection of public health, safety, and welfare.

This permit is effective as of July 6, 1990, and shall remain in effect until July 6, 2000, unless revoked and reissued, or revoked in accordance with 25 Pa. Code §§75.278, 75.279 and 75.280, or continued.

PART I - STANDARD CONDITIONS

A. EFFECT OF PERMIT

This permit authorizes only the management of hazardous waste expressly described in this permit and does not authorize any other management of hazardous waste. Issuance of this permit does not convey property rights of any sort or any exclusive privilege; nor does it authorize any injury to persons or property, any invasion of other private rights, or any infringement of State or local laws or regulations. Compliance with the terms of this permit does not constitute a defense to any action brought under the Act or any other law governing protection of public health or the environment.

B. PERMIT ACTIONS

This permit may be modified, revoked and reissued, revoked for cause as specified in 25 Pa. Code §§75.278, 75.279, and 75.280 or suspended in accordance with the Act. The filing of a request for a permit modification, revocation and reissuance, or revocation or the notification of planned changes or anticipated noncompliance on the part of the Permittee does not stay or supersede the applicability or enforceability of any permit condition.

C. SEVERABILITY

The provisions of this permit are severable, and if any provision of this permit or the application of any provision of this permit to any circumstance is held to be invalid, the application of such provision to other circumstances and the remaining provisions of this permit shall not be affected thereby.

D. DEFINITIONS

For the purpose of this permit, terms used herein shall have the same meaning as those in Title 25 of the Pennsylvania Code (25 Pa. Code Chapter 75), unless this permit specifically states otherwise; where terms are not otherwise defined, the meaning associated with such terms shall be as defined by a standard dictionary reference or the generally accepted scientific or industrial meaning of the term. "The Department" is the Department of Environmental Resources of the Commonwealth of Pennsylvania.

E. REPORTS, NOTIFICATIONS AND SUBMISSIONS TO THE DEPARTMENT

All reports, notifications or other submissions which are required by this permit to be sent or given to the Department should be sent certified mail or given to:

The Regional Solid Waste Manager
Department of Environmental Resources
Norristown Regional Office
1875 New Hope Street
Norristown, Pennsylvania 19401

F. SIGNATORY REQUIREMENTS

All reports or other information requested by the Department shall be signed and certified as required by 25 Pa. Code §75.265(z)(13).

G. DOCUMENTS TO BE MAINTAINED AT THE FACILITY SITE

The Permittee shall maintain at the facility, until closure is completed and certified by an independent registered professional engineer, the following documents and amendments, revisions and modifications to these documents:

1. Waste analysis plan required by 25 Pa. Code §75.264(c)(3) and this permit.
2. Personnel training documents and records required by 25 Pa. Code §75.264(f)(6) and this permit.
3. Contingency plan required by 25 Pa. Code §75.264(i)(9)(i) and this permit.
4. Closure plan required by 25 Pa. Code §75.264(o)(3) this permit.
5. Annually-adjusted cost estimate(s) for facility closure required by 25 Pa. Code §75.319 and this permit.
6. Operating record required by 25 Pa. Code §75.264(k) and Part II, Section H.1 of this permit.
7. Inspection schedules and logs required by 25 Pa. Code §75.264(e)(2)(i) and this permit.
8. Documents required by Part I, Sections H.9, H.13, H.14, H.15, and Part II, Section L of this permit.

H. DUTIES AND REQUIREMENTS

1. Duty to Comply. The Permittee shall comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the Act and the regulations promulgated thereunder and is grounds for enforcement action; for permit revocation, revocation and reissuance, or modification; or for denial of a permit renewal application.

2. Duty to Reapply. If the Permittee wishes to continue an activity regulated by this permit after the expiration date of this permit, the Permittee must submit a complete application for a new permit at least 180 days before this permit expires.
3. Permit Expiration. This permit and all conditions therein will remain in effect beyond the permit's expiration date, provided the Permittee submits a complete application, within six months of the expiration date, and through no fault of the Permittee, the Department has not issued a new permit.
4. Need to Halt or Reduce Activity Not a Defense. It shall not be a defense for the Permittee in an enforcement action to argue that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
5. Duty to Mitigate. In the event of noncompliance with the Act, the regulations, or this permit, the Permittee shall take all necessary steps to prevent and abate any releases to the environment, and shall carry out such measures as are necessary to prevent significant adverse impacts on human health or the environment.
6. Proper Operation and Maintenance. The Permittee shall at all times properly operate and maintain all facilities and systems of storage, treatment and control (and related appurtenances) which are installed or used by the Permittee to achieve compliance with the Act, the regulations, and the conditions of this permit. Proper operation and maintenance shall include effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurance procedures. The Permittee shall operate back-up or auxiliary facilities or similar systems if necessary to achieve compliance with the Act, the regulations and the conditions of the permit.
7. Duty to Provide Information. The Permittee shall furnish to the Department within the time limit specified, any relevant information which the Department may request to determine whether cause exists for modifying, revoking and reissuing, or revoking this permit, or to determine compliance with this permit. The Permittee shall also furnish to the Department, upon request, copies of records required to be kept by the Permittee pursuant to the Act, the regulations, or any permit condition.
8. Inspection and Entry. The Permittee shall allow the Department, its agents and authorized representatives, upon the presentation of credentials and other documents as may be required by law, or without advance notice or a search warrant to:
 - a. Enter upon the Permittee's premises where a regulated facility or activity is located or conducted, or where records concerning the regulated facility or activity are kept;

- b. Have access to and copy, any records that must be kept under the conditions of this permit;
- c. Inspect any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under the Act, the regulations, or this permit;
- d. Sample or monitor any substances or parameters at any location for the purposes of assuring permit compliance or as otherwise authorized by the Act or the regulations; and
- e. Engage in any other activities necessary or appropriate to the documentation of events or conditions at any locations.

9. Monitoring and Records:

- a. Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity. The method used to obtain a representative sample of the waste to be analyzed must be the appropriate method from Appendix I of 25 PA Code 75.261 or an equivalent method approved by the Department. Laboratory methods must be those specified in Appendix III of 25 Pa. Code §75.261; Test Methods for Evaluating Solid Waste: Physical/Chemical Methods (U.S. EPA Document SW-846, July 1982; 2nd ed.); Standard Methods of Waste Water Analysis (U.S. EPA; 15th ed.; 1980); or an equivalent method approved by the Department and as specified in the attached waste analysis plan.
- b. The Permittee shall retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports and records required by the Act, the regulations, or this permit, and all records of all data used to complete the application for this permit for a period of at least 3 years from the date of the sample, measurement, report or record, or application. These periods may be extended by request of the Department at any time and are automatically extended during the course of any unresolved enforcement action regarding this facility.
- c. The Permittee shall, at a minimum, keep monitoring records which include the following information:

- (1) The dates, exact place, and times of sampling or measurements;
 - (2) The individuals who performed the sampling or measurements;
 - (3) The dates analyses were performed;
 - (4) The individuals who performed the analyses;
 - (5) The analytical techniques or methods used; and
 - (6) The results of such analyses.
10. Reporting Planned Changes. The Permittee shall give notice to the Department of any planned physical alterations or additions to the permitted facility, prior to performing the alterations/changes. This notice must include a description of all incidents of noncompliance reasonably expected to result from the proposed changes. The Permittee shall not modify the facility without first obtaining a permit from the Department.
11. Anticipated Noncompliance. The Permittee shall give advance notice to the Department of any planned changes in the permitted facility or activity which may result in noncompliance with permit requirements.
12. Transfer of Permits. This permit shall not be transferred or assigned to any other person or municipality.
13. Twenty-Four Hour Reporting. The Permittee shall report to the Department any noncompliance with the Act, the regulations or any condition of this permit or any occurrence or event at the facility which may endanger health or the environment.
- a. Information shall be provided orally within twenty-four (24) hours from the time the Permittee becomes aware of the circumstances. This report shall include the following:
 - (1) Information concerning release or potential release of any hazardous waste from the facility that may endanger public drinking water supply sources.
 - (2) Any information of a release, potential release, or discharge of hazardous waste from the facility, or information of a potential or actual fire or explosion at the facility, which may threaten the environment or human health.
 - b. The description of the occurrence and its cause shall include:

- (1) Name, address, and telephone number of the owner or operator;
 - (2) Name, address, and telephone number of the facility;
 - (3) Date, time, and type of incident;
 - (4) Name and quantity of material(s) involved;
 - (5) The extent of injuries, if any;
 - (6) An assessment of actual or potential hazards to the environment and human health at or near the facility; and
 - (7) Estimated quantity and disposition of recovered material that resulted from the incident.
- c. A written submission shall also be provided to the Department within five (5) days of the time the permittee becomes aware of the circumstances. The written submission shall contain a description of the noncompliance and its cause; the period of noncompliance (including exact dates and times); if the noncompliance has not been corrected, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent reoccurrence of the noncompliance. The Permittee need not comply with the five (5) day written notice requirement if the Department extends it to fifteen (15) days.
14. Other Noncompliance. The Permittee shall report to the Department all other instances of noncompliance not otherwise required to be reported above, at the time monitoring reports are submitted. The reports shall contain the information listed in permit condition I.H.13.
15. Other Information. Whenever the Permittee becomes aware that it failed to submit any relevant facts in the permit application or submitted incorrect information in a permit application or in any report to the Department, or whenever the Permittee becomes aware of circumstances which require a modification or clarification of any fact or representation made to the Department in connection with a permit application, it shall promptly submit such facts or information to the Department.

PART II - GENERAL FACILITY CONDITIONS

A. DESIGN AND OPERATION OF FACILITY

The Permittee shall maintain and operate the facility to minimize the possibility of a fire, explosion, or release of hazardous waste or hazardous waste constituents to air, soil, surface water, or groundwater which could threaten human health or the environment.

B. GENERAL WASTE ANALYSIS

The permittee shall follow the procedures described in the attached waste analysis plan, Attachment 1. The Permittee shall verify its waste analysis as part of its quality assurance program, in accordance with current EPA practices (Test Methods for Evaluating Solid Waste: Physical/Chemical Methods SW-846, July 1982; 2nd ed.) or equivalent methods approved by the Department in accordance with procedures in 25 Pa. Code §75.260(c); and at a minimum maintain proper functional instruments, use approved sampling and analytical methods, verify the validity of sampling and analytical procedures, and perform correct calculations.

C. SECURITY

The Permittee shall comply with the security provisions of 25 Pa. Code §75.264(d)(2) and (3).

D. GENERAL INSPECTION REQUIREMENTS

The Permittee shall follow the inspection plan set out in the inspection schedule, Attachment 2. The permittee shall remedy any deterioration or malfunction discovered by an inspection as required by 25 Pa. Code §75.264(e)(4). Records of inspections shall be kept as required by 25 Pa. Code §75.264(e)(5).

E. PERSONNEL TRAINING

The Permittee shall conduct personnel training as required by 25 Pa. Code §75.264(f). This training program shall follow the attached outline, Attachment 3. The Permittee shall maintain training documents and records as required by 25 Pa. Code §75.264(f)(6) and (7).

F. PREPAREDNESS AND PREVENTION

1. Required Equipment: At a minimum, the Permittee shall equip the facility with the equipment set forth in the PPC plan, Attachment 4, as required by 25 Pa. Code §75.264(h)(2).

2. Testing and Maintenance of Equipment. The Permittee shall test and maintain the equipment specified in the previous permit condition and in Attachment 4 as necessary to assure its proper operation in time of emergency.
3. Access to Communications or Alarm System. The Permittee shall maintain access to the communications or alarm system as required by 25 Pa. Code §75.264(h)(4) and (5).
4. Required Aisle Space. At a minimum, the Permittee shall maintain aisle space or required by 25 Pa. Code §75.264(h)(6) and as shown on the plans and specifications, Attachment 6.
5. Arrangements with Local Authorities. The Permittee shall maintain arrangements with State and local authorities as required by 25 Pa. Code §75.264(h)(7). If State or local officials refuse to enter into or renew existing preparedness and prevention arrangements with the Permittee, the Permittee must document this refusal in the operating record.

G. PREPAREDNESS, PREVENTION AND CONTINGENCY (PPC) PLAN

1. Implementation of PPC Plan. The Permittee shall immediately carry out the provisions of the PPC plan, Attachment 4, and follow the emergency procedures described by 25 Pa. Code §75.264(i)(12)-(21) whenever there is a fire, explosion, emission or discharge of hazardous waste or hazardous waste constituents which could threaten human health or the environment.
2. Copies of Plan: The Permittee shall comply with the requirements of 25 Pa. Code §75.264(i)(9).
3. Amendments to Plan: The Permittee shall review and immediately amend, if necessary, the PPC plan, as required by 25 Pa. Code §75.264(i)(10).
4. Emergency Coordinator. The Permittee shall comply with the requirements of 25 Pa. Code §75.264(i)(11).
5. Emergency Procedures. The Permittee shall comply with the requirements of 25 Pa. Code §75.264(i)(12)-(21).

H. RECORDKEEPING AND REPORTING

1. Operating Record. The Permittee shall maintain a written operating record at the facility in accordance with 25 Pa. Code §75.264(k)(1) and (2).
2. Quarterly Facility Report. The Permittee shall comply with all applicable quarterly facility report requirements of 25 Pa. Code §75.264(m)(1).

3. Annual Report. The Permittee shall comply with all applicable annual report requirements of 25 Pa. Code §75.264(m)(3).
4. Required Reports. The Permittee shall comply with all applicable reporting requirements as described in Part I, Sections E, F, H.7, H.9, H.10, H.13, H.14, and Part II, Sections G.2, L of this permit.

I. CLOSURE

1. Performance Standard. The Permittee shall close the facility as required by 25 Pa. Code §75.264(o)(2) and in accordance with the closure plan, Attachment 5.
2. Amendment to Closure Plan. The Permittee shall amend the closure plan in accordance with 25 Pa. Code §75.264(o)(4) whenever necessary.
3. Notification of Closure. The Permittee shall notify the Department in writing at least 180 days prior to the date he expects the final volume of waste.
4. Time Allowed for Closure. After receiving the final volume of hazardous waste, the Permittee shall remove from the site all hazardous waste and shall complete closure activities in accordance with the schedules specified in the closure plan, Attachment 5.
5. Disposal or Decontamination of Equipment. The Permittee shall decontaminate and/or dispose of all facility equipment and structures as required by 25 Pa. Code §75.264(o)(8) and the closure plan, Attachment 5.
6. Certification of Closure. The Permittee shall certify that the facility has been closed in accordance with the specifications in the closure plan as required by 25 Pa. Code §75.264(o)(9).

J. COST ESTIMATE FOR FACILITY CLOSURE

1. Annual Adjustment. The Permittee shall adjust the closure cost estimates for inflation within 30 days after each anniversary of the date on which the first cost estimate was made as required by 25 Pa. Code §75.319(b).
2. Adjustment for Changed Conditions. The Permittee shall revise the cost estimate whenever there is a change in the facility's closure plan or in the measures necessary to prevent adverse effects upon the environment as required by 25 Pa. Code §75.319(c).

K. BONDING REQUIREMENT

The Permittee shall maintain the collateral bond, submitted to and approved by the Department as required by 25 Pa. Code §75.311 and shown in this permit as Attachment No. 9. The Permittee shall comply with all applicable bond replacement requirements of 25 Pa. Code §75.316.

L. LIABILITY INSURANCE

The Permittee shall comply with the liability insurance requirements of 25 Pa. Code §75.332 and the documentation requirements of 25 Pa. Code §75.333 and §75.334. These include the requirements to have and maintain liability coverage for sudden pollutional occurrences in the amount of at least \$2 million per occurrence with an annual aggregate of at least \$4 million, exclusive of legal defense costs. The Permittee shall submit new certificates of liability insurance 60 days prior to the expiration of the current certificate.

M. REQUIRED NOTICES

Notice to Generator. When the Permittee plans to receive hazardous waste from an off-site source (except where the Permittee is also the generator), he must inform the generator in writing that he has the appropriate permits for, and will accept, the waste the generator is shipping. The Permittee must keep a copy of this written notice as part of the operating record. (See permit II.H.1)

N. GENERAL REQUIREMENTS FOR IGNITABLE, REACTIVE, OR INCOMPATIBLE WASTE

The Permittee shall comply with the requirements of 25 Pa. Code §75.264(g).

O. MANIFEST SYSTEM

The Permittee shall comply with the manifest requirements of 25 Pa. Code §75.264(j).

PART III - STORAGE IN CONTAINERS**A. WASTE IDENTIFICATION**

The Permittee may store the following wastes in containers at the facility, subject to the terms of this permit.

<u>HAZARDOUS WASTE CODE</u>	<u>DESCRIPTION</u>
F003	The following spent non-halogenated solvents: xylene, acetone, ethyl acetate, ethyl benzene, ethyl ether, methyl isobutyl ketone, n-butyl alcohol, cyclohexanone, and methanol; and the still bottoms from the recovery of these solvents.
F004	The following spent non-halogenated solvents: cresols and cresylic acid, and nitrobenzene; and the still bottoms from the recovery of these solvents.
F005	The following spent non-halogenated solvents: toluene, methyl ethyl ketone, carbon disulfide, isobutanol, pyridine and the still bottoms from the recovery of these solvents.
K048	Dissolved air flotation (DAF) float from the petroleum refining industry
K049	Slop oil emulsion solids from the petroleum refining industry
K050	Heat exchanger bundle cleaning sludge from the petroleum refining industry
K051	API separator sludge from the petroleum refining industry
K052	Tank bottoms (leaded) from the petroleum refining industry
D001	Ignitable waste
D002	Corrosive waste
D005	Barium

D007

Chromium

D008

Lead

<u>HAZARDOUS WASTE CODE</u>	<u>DESCRIPTION</u>
P022	Carbon disulfide
P110	Tetraethyl lead
U019	Benzene
U052	*Cresylic acid cresols
U054	cresylic acid
U056	Cyclohexane
U077	Ethane, 1,2-dichloro
U125	furfural
U135	Hydrogen sulfide
U151	Mercury
U154	Methanol
U159	2-Butanone
U188	Phenol
U220	Toluene
U226	1,1,1-Trichloroethane
U239	Xylene

B. DURATION OF STORAGE

The Permittee shall not store containers of hazardous waste at this facility in excess of one year.

C. CONDITION OF CONTAINERS

If a container holding hazardous waste is not in good condition (e.g., severe rusting apparent structural defects) or if it begins to leak, the Permittee shall transfer the hazardous waste from such container to a container that is in good condition or otherwise manage the waste in compliance with the conditions of this permit.

D. PLACEMENT REQUIREMENTS

The Permittee shall store all hazardous waste containers in accordance with the following volume, content and location requirements:

Area A - Ignitable waste located outside of the refinery adjacent to Middle Creek divided into 12 cells holding 64 drums each.

Permitted Waste Codes:

D001, F003, F004, F005, U019, U052, U056, U077, U159, U188, U220,
U226, U239

Maximum volume of waste allowed: 42 240-gallon drums
Maximum no. of containers allowed: 768 55-gallon drums

Area B - Toxic waste storage area located outside of the refinery adjacent to Middle Creek divided into 12 cells holding 64 drums each.

Permitted Waste Codes:

K048, K049, K050, K051, K052, D002, D005, D007, D008, P022, P110,
U135, U151

Maximum volume of waste allowed: 42 240-gallon drums
Maximum no. of containers allowed: 768 55-gallon drums

E. COMPATIBILITY OF WASTES WITH CONTAINERS

The Permittee shall assure that the ability of the container to contain the waste is not impaired as required by 25 Pa. Code §75.264(q)(2).

F. MANAGEMENT OF CONTAINERS

The Permittee shall manage containers as required by 25 Pa. Code §75.264(q)(3) and (4).

G. CONTAINMENT

The Permittee shall construct and maintain the containment system as required by 25 Pa. Code §75.264(q)(10)-(12) and the attached plans and specifications, Attachment 6.

H. CONTAINER STACKING HEIGHT, WIDTH, AND DEPTH

The Permittee shall store containers of hazardous waste as required by 25 Pa. Code §75.264(q)(14) and the attached plans and specifications, Attachment 6.

I. SPECIAL REQUIREMENTS FOR IGNITABLE OR REACTIVE WASTES

The Permittee shall not locate containers holding ignitable or reactive wastes within 15 meters (50 feet) of the facility's property line, nor within 40 feet of a building.

J. SPECIAL REQUIREMENTS FOR INCOMPATIBLE WASTES

1. Placement of Incompatible Wastes. Prior to placing incompatible wastes and/or materials in the same container, the Permittee shall follow the procedures specified in Attachment 8.
2. Incompatible Wastes in Unwashed Containers. The Permittee shall not place hazardous waste in an unwashed container that previously held an incompatible waste or material.
3. Storage of Incompatible Waste. The Permittee shall store containers of incompatible wastes as indicated in the attached plans, Attachment 8, as required by 25 Pa. Code §75.264(q)(9).
4. Documentation: The Permittee must document compliance with sections (1) and (2) of this condition as required by 25 Pa. Code §75.265(g)(3) and place this documentation in the operating record (permit condition II.H.1).

K. WEIGHING OR MEASURING FACILITIES

The Permittee shall provide, maintain, and operate weighing or measuring facilities as required by 25 Pa. Code §75.264(q)(6).

L. OPERATING HOURS

The Permittee shall maintain at the entrance to the facility a sign displaying the hours of operation. The lettering shall be a minimum of four inches in height and of a color contrasting with its background.

PART IV - STORAGE/TREATMENT IN TANKS

A. WASTE IDENTIFICATION

The Permittee may store/treat the following hazardous wastes in tanks, subject to the terms of this permit:

a. <u>TANK NUMBER(S)</u>	<u>HAZARDOUS WASTE NUMBER</u>
1	K048, K049, K050, K051, K052, D001, D008, D007
2	K048, K049, K050, K051, K052, D001, D008, D007
3	K048, K049, K050, K051, K052, D001, D008, D007
4	K048, K049, K050, K051, K052, D001, D008, D007
5	K048, K049, K050, K051, K052, D001, D008, D007
6	K048, K049, K050, K051, K052, D001, D008, D007
51	K048, K049, K050, K051, K052, D001, D008, D007
52	K048, K049, K050, K051, K052, D001, D008, D007
53a	K048, K049, K050, K051, K052, D001, D008, D007
53b	K048, K049, K050, K051, K052, D001, D008, D007
53c	K048, K049, K050, K051, K052, D001, D008, D007
56	K048, K049, K050, K051, K052, D001, D008, D007

B. DURATION OF STORAGE

The Permittee shall not store hazardous wastes in tanks at this facility in excess of one year.

C. DESIGN AND CONSTRUCTION OF TANKS

The Permittee shall construct, modify, and maintain all tanks in accordance with the plans and specifications in Attachment 7. The Permittee shall maintain the minimum shell thickness specified below at all times to ensure sufficient structural strength.

<u>b. TANK NUMBER(S)</u>	<u>MINIMUM SHELL THICKNESS (INCHES)</u>
1	12
2	12
3	12
4	.1875
5	.1875
6	12
51	12
52	12
53a, 53b, 53c	.5625
56	12

D. PROTECTION FROM OVERFILLING

The Permittee shall prevent overfilling of tanks by the methods specified in Attachment 7 and summarized below.

<u>c. TANK NUMBER(S)</u>	<u>TYPE OF CONTROL</u>
1	High Level Alarm
2	High Level Alarm
3	High Level Alarm
4	High Level Alarm
5	High Level Alarm
6	High Level Alarm
51	High Level Alarm
52	High Level Alarm
53a, 53b, 53c	High Level Alarm
56	High Level Alarm

E. SECONDARY CONTAINMENT

The Permittee shall construct and/or maintain the containment structure as required by 25 Pa. Code §75.264(r)(6) and the attached plans and specifications, Attachment 7.

F. EMERGENCY REPAIRS; CONTINGENCY PLAN

1. The Permittee shall inspect the tanks in accordance with the Tank Evaluation and Repair (TER) Plan whenever there is any indication of a possible failure as required by 25 Pa. Code §75.264(r)(20).

2. Whenever there is evidence of tank failure, the Permittee shall remove the tank from service as required by 25 Pa. Code §75.264(r)(21) and implement the procedures required by 25 Pa. Code §75.264(r)(22) and specified in the PPC Plan, Attachment 4.
3. Prior to restoring it to service, the Permittee shall repair the tank and obtain a certification from a registered professional engineer that it meets the design specifications approved in this permit, as required by 25 Pa. Code §75.264(r)(24).
4. If a tank has been removed from service due to failure and is not being repaired, the permittee shall close it as required by 25 Pa. Code §75.264(r)(25).

G. ACCESS ROADS

The Permittee shall construct and/or maintain access roads as required by 25 Pa. Code §75.264(r)(26) and the attached plans and specifications, Attachment 7.

H. BUFFER ZONE

The Permittee shall establish and maintain a buffer zone of 50 feet between the property line and the permitted facility within which no solid waste treatment, storage, or disposal activities shall occur.

I. EQUIPMENT

1. Equipment Maintenance. The Permittee shall maintain tank operating equipment in operable condition and adequate in size and performance capability to assure that the facility operation will not be interrupted during normal working periods and that the facility operation is in accordance with this permit.
2. Standby Equipment. The Permittee shall maintain standby equipment on-site or readily available for use in the event of a major equipment breakdown.

J. TREATMENT OF WASTES IN TANKS

The Permittee shall conduct all treatment operations in accordance with the procedures in Attachment 7.

K. SPECIAL REQUIREMENTS FOR IGNITABLE OR REACTIVE WASTES

1. Special Requirements. The Permittee shall not place ignitable or reactive waste in a tank unless the procedures described in Attachment 8 are followed.

2. Documentation. The Permittee shall document compliance with the above permit condition as required by 25 Pa. Code §75.264(g)(3) and place this documentation in the operating record (permit condition II.H.1).
3. NFPA Requirements. The Permittee shall comply with all applicable requirements for covered tanks listed in the National Fire Protection Association's "Flammable and Combustible Liquids Code, 1981", or latest revised edition.

L. SPECIAL REQUIREMENTS FOR INCOMPATIBLE WASTE

1. Incompatible Waste Precautions. The Permittee shall not place incompatible wastes in the same tank or place hazardous waste in a unwashed tank that previously held an incompatible waste or material unless the procedures specified in Attachment 8 are followed.
2. Documentation. The Permittee shall document compliance with the above permit condition as required by 25 Pa. Code §75.264(g)(3) and place this documentation in the operating record (permit condition II.H.1).

M. WASTE ANALYSIS

The Permittee shall conduct waste analyses and trial treatment or storage tests, or shall obtain written, documented information as required by 25 Pa. Code §75.264(r)(7) and the Waste Analysis Plan, Attachment 1, before chemically treating or storing a hazardous waste which is substantially different from waste previously treated or stored in a tank or before chemically treating hazardous waste with a substantially different process than previously used in a tank. The analyses, tests, and information shall be placed in the operating record (permit condition II.H.1).

N. WEIGHING OR MEASURING FACILITIES

The Permittee shall provide, maintain and operate weighing or measuring facilities as required by 25 Pa. Code §75.264(r)(17).

O. OPERATING HOURS

The Permittee shall maintain at the entrance to the facility a sign displaying hours of operation. The lettering shall be a minimum of four inches in height and of a color contrasting with its background.

P. SURFACE WATER MANAGEMENT

1. Design Standards. The Permittee shall manage surface water on the site as required by 25 Pa. Code §75.264(r)(28) and the plans and specifications in Attachment 7.

2. Run-off. The Permittee shall manage surface water run-off as required by 25 Pa. Code §75.264(r)(29) and the plans and specifications in Attachment 7.
3. Run-on. The Permittee shall control run-on as required by 25 Pa. Code §75.264(r)(30) and the plans and specifications in Attachment 7.

Q. DUST CONTROL

The Permittee shall prevent dust from hampering site operations or from causing health or safety hazards or nuisances.

R. WASTE TRACKING

The Permittee shall minimize or eliminate the tracking of waste within or outside the site as required by 25 Pa. Code §75.264(r)(39).

S. UNLOADING AREAS

The Permittee shall maintain unloading areas to permit vehicles to unload promptly.

7/6/90
Date Signed

Joseph A. Feola
JOSEPH A. FEOLA
Environmental Protection Manager
Bureau of Waste Management

(SRP)



Pennsylvania Department of Environmental Protection

Lee Park, Suite 6010
555 North Lane
Conshohocken, PA 19428

October 25, 1999

Southeast Regional Office

610-832-6212
Fax 610-832-6143

CERTIFIED MAIL NO. P 092 246 974

Ms. Roseann Aloï
Environmental Specialist
Sun Company, Inc.
P.O. Box 426
Marcus Hook, PA 19061-0426

Re: Permit No. PAD908550594
Sunoco, Inc. (R&M)
APS No. 23616, AUTH No. 23591
Borough of Marcus Hook
Delaware County

Dear Ms. Aloï:

The Department has reviewed your application for a minor modification to the container management plan for the above referenced permit. The modifications do not propose any increase in storage volumes, but do provide for storage of containers other than drums and also provide for the storage and management of residual waste at the hazardous waste management unit. We have determined that you have satisfied all applicable requirements necessary to perform this activity. Therefore, Attachments 4 (PPC Plan) and 6 (Container Management Plan) of the referenced permit are hereby modified to incorporate the revisions to those plans contained in your May 19, 1999 application in accordance with Act 97, the PA Solid Waste Management Act. A revised list of attachments is enclosed and should be placed in your permit. Please direct any questions to Mr. James Wentzel, Chief, Engineering Services.

Compliance with the limitations and stipulations that have been set forth on your permit is mandatory.



Ms. Roseann Aloï

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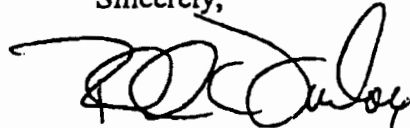
October 25, 1999

Any person aggrieved by this action may appeal, pursuant to Section 4 of the Environmental Hearing Board Act, 35 P.S. Section 7514, and the Administrative Agency Law, 2 PA C.S. Chapter 5A, to the Environmental Hearing Board, Second Floor, Rachel Carson State Office Building, 400 Market Street, P.O. Box 8457, Harrisburg, PA 17105-8457, 717-787-3483. TDD users may contact the Board through the Pennsylvania Relay Service, 800-654-5984. Appeals must be filed with the Environmental Hearing Board within 30 days of receipt of written notice of this action, unless the appropriate statute provides a different time period. Copies of the appeal form and the Board's rules of practice and procedure may be obtained from the Board. The appeal form and the Board's rules of practice and procedure are also available in braille or on audio tape from the Secretary to the Board at 717-787-3483. This paragraph does not, in and of itself, create any right of appeal beyond that permitted by applicable statutes and decisional law.

Please take the time to complete the enclosed questionnaire and return it in the pre-addressed and stamped envelope. Your response will be taken into account, as we consider ways of improving our service to the public and regulated community.

Thank you for your cooperation.

Sincerely,



Ronald C. Furlan, P.E.
Regional Manager
Waste Management Program

Enclosures: List of Attachments 1 to 9

cc: Borough of Marcus Hook
Delaware County Planning Department
Mr. Gotthold, USEPA
Mr. Hayes, Division of HWM
Mr. Bonner
Mr. Wentzel
Mr. Aresery
Ms. W. Warren
Re 30 (GJC99)291-11

2510-FM-LRWM0085 Rev. 9/95

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

PERMIT
FOR
HAZARDOUS WASTE TREATMENT, STORAGE AND/OR DISPOSAL FACILITY

Permit No. PAD980550594Date Issued October 25, 1999Date Expires July 6, 2000

LIST OF ATTACHMENTS

1. Waste Analysis Plan
2. Inspection Schedule
3. Personnel Training Outline
4. PPC Plan, revised 5/99
5. Closure Plan
6. Container Storage Management Plan, revised 5/99
7. Tank Storage Management Plan
8. Procedures for Handling Ignitable, Reactive or Incompatible Wastes
9. Bond Documents

THIS PERMIT IS NON - TRANSFERABLE

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